

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DAVID CATANZARO,	)	CASE NO.: 1:13-CV-00996
	)	
Plaintiff,	)	JUDGE DAN AARON POLSTER
	)	
vs.	)	<b><u>INITIAL DISCLOSURES OF</u></b>
	)	<b><u>WAYNE D. PORTER</u></b>
SEAMAN GARSON LLC/LLP, et al.,	)	
	)	
Defendants.	)	

Now comes Defendant Wayne D. Porter, Jr. ("Porter" or "this Defendant"), by and through counsel Mazanec, Raskin & Ryder Co., L.P.A., and hereby makes the following Initial Disclosures pursuant to Rules 26(a)(1) and (2) of the Federal Rules of Civil Procedure:

**A. Individuals likely to have discoverable information:**

1. Plaintiff, David Catanzaro
2. Defendant, James DeRoche
3. Defendant, Wayne D. Porter
4. Unknown representatives of Church & Dwight Co.
5. Will supplement.

**B. Documents used to support claims/defenses:**

1. Documents (Bates Numbered WDP\_00001 – WDP\_02356 and PORTER, W. 000001 – 003063) will be provided via regular mail on CD.
2. Will supplement.

**C. Damages:**

1. Not applicable to Defendant, Wayne D. Porter

**D. Insurance:**

1. Insurance Policy (Bates Numbered WDP\_02357 – WDP\_2370) will be provided via regular mail on CD.

**E. Disclosure of Expert Testimony:**

1. Will supplement.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

*s/Elaine Tso*

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THOMAS S. MAZANEC (0009050)

ELAINE TSO (0081474)

100 Franklin's Row

34305 Solon Road

Cleveland, OH 44139

(440) 248-7906

(440) 248-8861 – Fax

Email: [etso@mrrlaw.com](mailto:etso@mrrlaw.com)

Counsel for Defendant Wayne D. Porter, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2013, a copy of the foregoing Initial Disclosures of Wayne D. Porter was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*s/Elaine Tso*

THOMAS S. MAZANEC (0009050)

ELAINE TSO (0081474)

Counsel for Defendant Wayne D. Porter, Jr.

CNAN-130109/Initial Disclosures of Wayne Porter